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June 21, 2022

VIA ECF

The Honorable John G. Koeltl United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007 Application granted. So ordered.

New York, NY June 22, 2022 /s/ John G. Koeltl
John G. Koeltl, U.S.D.J.

Re: Roche Cyrulnik Freedman LLP v. Cyrulnik, Case No. 1:21-cv-01746 (JGK)

Dear Judge Koeltl:

We represent Defendant/Counterclaim-Plaintiff Jason Cyrulnik and write, pursuant to Rule VI.A.2 of Your Honor's Individual Practices, in response to the letter from Plaintiff/Counterclaim-Defendant Roche Cyrulnik Freedman LLP requesting permission to file under temporary seal Exhibit 8 to Plaintiff's June 17, 2022 letter to the Court, as well as certain portions of the letter itself (Dkt. Nos. 139-40).

Cyrulnik respectfully requests that the Court permanently seal the information that Plaintiff sought to seal temporarily. Exhibit 8 is a picture of a baseless complaint that was filed against Mr. Cyrulnik as a tactic in a matrimonial proceeding involving a family member of his, which was then dropped and dismissed in its entirety, along with an order that it be expunged. The material redacted from the letter are references to Exhibit 8, as well as figures representing the fees billed to Cyrulnik's clients. We understand that Plaintiff/Counterclaim-Defendant does not oppose this request for sealing.

We thank the Court for its consideration of this request.

Respectfully,

Gavin D. Schryver

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cc: Counsel of Record (via ECF)